

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IGY OCEAN BAY PROPERTIES LIMITED and  
ISLAND GLOBAL YACHTING LTD.

Plaintiffs

-against-

OCEAN BAY PROPERTIES I LIMITED,  
OCEAN BAY PROPERTIES II LIMITED,  
BRITISH COLONIAL DEVELOPMENT COMPANY  
LIMITED, PRK HOLDINGS LTD., ADURION  
CAPITAL LIMITED and GEORGE ALLEN,

Defendants  
-----X

07-CV-10520 (VM)

**NOTICE OF MOTION  
TO DISMISS**

**ORAL ARGUMENT  
REQUESTED**

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law and the Declarations of George Allen, Jürg Gassmann, and Eugene Fraser, dated December 21, 2007, defendants PRK Holdings Ltd., Adurion Capital Limited., and George Allen, (collectively, "Defendants"), will move this Court, before the Honorable Victor Marrero, at the United States Courthouse, 500 Pearl Street, New York, New York at a date and time to be decided by the Court, for an Order dismissing the claims in the complaint for lack of personal jurisdiction pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure.

Dated: New York, New York  
December 21, 2007

Respectfully submitted,

/s/ John T. Morin  
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